



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

DARRYL DOCKERY

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

GREEN MARKELL
KOSEOGLU KORKUT
SGT. WEST BGD #370

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil
Rights

(Non-Prisoner Complaint)

Case No. 23-CV-3302-DG-VMS

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

ORIGINAL

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>DARRYL DOCKERY</u>
Street Address	<u>C/O 85 MacDougal Street</u>
City and County	<u>BROOKLYN NY Kings</u>
State and Zip Code	<u>NEW YORK 11232</u>
Telephone Number	<u>(347) 423-1330</u>
E-mail Address	<u>darryldockery33@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	<u>GREEN MARKELL</u>
Job or Title (if known)	<u>POLICE OFFICER BGD # 0986</u>
Street Address	<u>73rd PRECINCT</u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name

KOSEOGLU KORKUT

Job or Title
(if known)

Sergeant, Police officer
TAX Reg. NO 049176

Street Address

73rd Precinct

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

Defendant No. 3

Name

WEST

Job or Title
(if known)

SERGEANT Badge #370

Street Address

73rd Precinct

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

Defendant No. 4

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ State or local officials (a § 1983 claim)
☐ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

The Right to Travel by private conveyance for private purposes.
Arrest without a warrant, False imprisonment under Due Process
of Law Denial of property by theft, illegal Search and Seizure,
Trespass, assault and battery, and Copyright infringement.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Each defendant Failed to follow the United States Constitution
and acted under Color of Law and to adhere to many Supreme
Court's ruling on Warrantless arrest, Traveling on public roads, search
without a warrant, Deprivation of Liberty, Life and Pursuit
of Happiness, Copyright infringement.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

in Brooklyn NY on St Johns and Buffalo Street

B. What date and approximate time did the events giving rise to your claim(s) occur?

On March 17, 2023 4:06 PM

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

On March 17, 2023 I was traveling on my way home from work I drove my car on Howard Ave where I seen officer Green sitting in his patrol car I turned down St Johns street about a block away I notice patrol car is behind me with his Emergency lights on I pulled over officer Green approach my car and ask for my ID I ask po Green why he pulled me over he stated to me cause I have only one license plate on my car he ordered me to step out the car I then ask to speak to his superior in charge officer Green proceeded to snatch me out my car and placed me in handcuffs went into my pocket and took my wallet without my permission.

(Continue.
(See Attached)

I was Violently Placed in his Patrol Car, Sergeant West
Badge #370 Came upon the Scene, I Explained to Sergeant
west that Officer Green Badge #6986 Did not have any articulable
Reasonable Suspicion or Reasonable articulable Fact to Stop Me
From Traveling, Sergeant West Badge #370 Informed Officer
Green Badge #6986 To Take Me to the Precinct and imprison
Me without any warrant or any Lawful Cause. I was then
Placed in a holding cell for about 5 1/2 hours, Stripped of my
Clothing, Fingerprinted, Photographed, Denied Medical attention when
requested; No Food to Eat or Phone Call to my Attorney in fact.
Denied to see a Judge From point of arrest, Stripped of all my
Property. I then ask to speak to the Commandor in Charge
of the 73rd Precinct which was Sergeant Koseoglu, Korkut.
and explained the Same Facts of the Unlawful arrest and
among other things in which he informed Officer Green
To Place me in a holding cell. Then release after 5 1/2
hours.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I Sustained injuries; Assault and battery, physical inconvenience, discomfort, loss of time, mental suffering, injuries to reputation, distress and anguish, humiliation of the mind, public ridicule, denied medical attention upon request, unauthorized Copyright, use of my property

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I would honor The Court to grant my claim and relief on actual damages, punitive damages as well Exemplary damages. For the facts stated for Private Ensements and Public Ensements, Basis For these claims. Color Law Violations and Human Rights Violations
Please See Attached
Total amount in Damages Plaintiff Requesting
\$1,400,000.00 in USD Currency

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Continue

- 1) False imprisonment, assault and battery, Mental, Physical Emotional abuse, Deprivation of Basic Human Rights.
in the amount of \$ 1,000,000.00 in USD Currency
(one Million Dollars)
- 2) Produce Trade Name materials) under Threats, duress and or Coercion: (a) Name \$50,000.00 written by each informant(s)
\$ 150,000.00 in USD Currency
- 3) Trespass, carjacking, Theft, interfering with my Liberty
\$ 150,000.00 in USD Currency
- 4) Time Usage For Traffic Stop unlawfully \$ 10,000.00 per 60 ~~Seconds~~ M. notes x 300 M. notes Total 5½ hours
in the amount of \$50,000.00 USD Currency
- 5) Time Usage For Court appearances under protest and Duress
\$ 50,000.00 Each appearance(s).

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/2, 2023

Signature of Plaintiff by: Darryl Dockery ©: All Rights reserved

Printed Name of Plaintiff DARRYL DOCKERY: All Rights reserved
without recourse